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**Counsel for Proposed Lead Plaintiff Paul Berger**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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VIVIAN AND LEONARD JUDELSON, as  
Trustees of the VIVIAN JUDELSON  
REVOCABLE TRUST DATED 10/9/95,  
and VIVIAN S. JUDELSON CONTRIBUTORY  
IRA, Individually and On Behalf of All Others  
Similarly Situated,

ECF Case

Civil Action No. 07-7972

Plaintiffs,

vs.

TARRAGON CORPORATION, WILLIAM S.  
FRIEDMAN, ROBERT P. ROTHENBERG  
and ERIN D. PICKENS,

Defendants.

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HENRY NELSON, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

Civil Action No. 07-08438

TARRAGON CORPORATION, WILLIAM S.  
FRIEDMAN, ROBERT P. ROTHENBERG  
and ERIN DAVIS PICKENS,

Defendants.

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PAUL BERGER, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiffs,

Civil Action No. 07-8689

vs.

TARRAGON CORPORATION, WILLIAM S.  
FRIEDMAN, ROBERT P. ROTHENBERG  
and ERIN D. PICKENS,

Defendants.

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**AFFIDAVIT OF JEFFREY S. ABRAHAM IN OPPOSITION TO  
THE COMPETING MOTIONS FOR APPOINTMENT AS LEAD PLAINTIFF**

STATE OF NEW YORK )  
                      )  
                      ) ss.  
COUNTY OF NEW YORK )

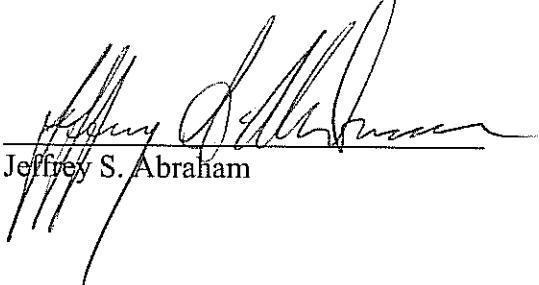
JEFFREY S. ABRAHAM, being duly sworn deposes and says:

1. I am a partner at Abraham, Fruchter & Twersky, LLP, counsel for plaintiff Paul Berger in the above-captioned actions and am admitted to practice before this Court. I am submitting this affidavit in opposition to the competing motions for appointment as lead plaintiff, and in further support of the motion of Mr. Paul Berger to be appointed lead plaintiff and for approval of his selection of my firm as lead counsel in this action.

2. Attached hereto as Exhibit A is a true and correct copy of pages from the offices of the Brodsky & Smith, LLC firm's Internet site describing the firm, its four offices and four attorneys.

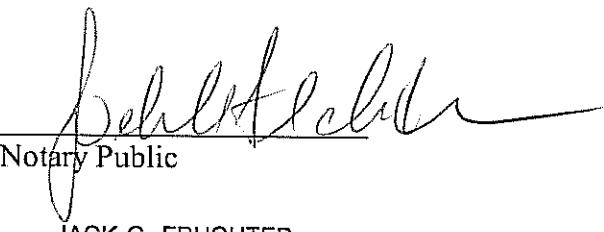
3. Attached hereto as Exhibit B is a true and correct copy of a mailing which I am informed Mr. Berger received from the Schiffrian & Barroway, LLP law firm with respect to

litigation brought against Titan Corporation.



Jeffrey S. Abraham

Sworn Before Me This  
28th Day of November, 2007



Notary Public

JACK G. FRUCHTER  
Notary Public, State of New York  
No. 02FR6073524  
Qualified in Nassau County  
Commission Expires April 22, 2012